

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF FEDERAL DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,
Plaintiff,

Case No. 8:22CR222

v.

**UNOPPOSED MOTION TO
CONTINUE**

MARK BERNAL,
Defendant.

COMES NOW, Mark Bernal, by and through counsel, and hereby moves this Court for an order continuing the Sentencing in the above-captioned matter currently set for August 16, 2023, at 11:00 a.m., for the following good and sufficient reasons, to wit:

1. Counsel for Defendant is scheduled for back-to-back jury trials starting the week of August 14th, 2023, in the matters of *State of Nebraska v. Travis Belina*, CR 22-246, Madison County, Nebraska and *State of Nebraska v. Travis Belina*, CR 23-31, Madison County, Nebraska.
2. Counsel for Defendant anticipates that both trials will take place as scheduled and are unlikely to be resolved without trial.
3. Counsel for Defendant has contacted Counsel for Plaintiff, who does not oppose the continuance.

WHEREFORE, for the good and sufficient reasons set forth above, counsel for Defendant hereby moves this Court for an Order continuing the Sentencing scheduled in the above-captioned matter for a reasonable period of time into the future.

Respectfully submitted,
Mark Bernal, Defendant

/s/ Eric Hagen
Eric Hagen #27326,
BERRY LAW FIRM
1414 Harney Street, Suite 400
Omaha, NE 68102
(402) 466-8444
Eric.hagen@berrylawfirm.com
Lawyers for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies that he caused a true and correct copy of the above and foregoing to be served upon the Plaintiff herein by electronic service of the same on June 20, 2023.

/s/ Eric Hagen
Eric Hagen, # 27326